



M O S K O W I T Z & B O O K , L L P

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November 19, 2020

By ECF

Hon. Vernon Broderick  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J. 11/20/2020

Re: Ricardo Castro and Jeff Jackson v. AABC Construction, Inc. et ano.  
17 Civ. 1205 (VSB) (KNF)

Dear Judge Broderick:

This firm represents Plaintiffs Ricardo Castro and Jeff Jackson in the above-captioned matter. I write to request that Your Honor extend the deadlines for the parties to make their pretrial submissions, which were originally set forth in Your Honor's May 22, 2020 Order (ECF No.79 herein), and which have subsequently been extended twice, by 30 days and 14 days, respectively, at Plaintiffs' request (ECF Nos. 83 and 85).

I have conferred with Defendant Daniel Sheeri, who indicated that he will require an additional 60 days to complete his portion of the proposed joint pretrial order and to evaluate whether he has any potential motions *in limine*. Mr. Sheeri further requested that I ask the Court for an adjournment on his behalf. Mindful of Mr. Sheeri's *pro se* status and grateful for his courtesies regarding my own previous requests for additional time, Plaintiffs have consented to Mr. Sheeri's request for a 60-day adjournment of the current deadlines.

Accordingly, I respectfully request that Your Honor extend the deadline for submission of a joint pre-trial order and of motions *in limine*, currently set for today, to January 18, 2021, and that Your Honor also adjourn the deadline for submission of oppositions to motions *in limine*, proposed voir dire questions, proposed verdict sheets, and proposed jury instructions from December 3, 2020 to February 1, 2021.

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Thank you for your consideration of this letter.

Very truly yours,

MOSKOWITZ & BOOK, LLP

By:



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Christopher R. Neff

cc: Daniel Sheeri, *by e-mail*  
David Wander, Esq., *by email*